

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
3 David A. Perlson (Bar No. 209502)
davidperlson@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
5 John Neukom (Bar No. 275887)
johnneukom@quinnemanuel.com
6 Jordan Jaffe (Bar No. 254886)
jordanjaffe@quinnemanuel.com
7 50 California Street, 22nd Floor
San Francisco, California 94111-4788
8 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

9
10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 CASE NO. 3:17-cv-00939-WHA

15 Plaintiff,

16 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO EXCLUDE REPORT AND
TESTIMONY OF DR. LAMBERTUS
HESSELINK**

17 vs.

18 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

19 Defendants.

20

21

22

23

24

25

26

27

28

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking LLC’s Administrative
 7 Motion to File Under Seal Portions of Its Motion to Exclude Report and Testimony of Dr. Lambertus
 8 Hesselink (the “Administrative Motion”). The Administrative Motion seeks an order sealing
 9 highlighted portions of Otto Trucking’s Motion to Exclude Report and Testimony of Dr. Lambertus
 10 Hesselink (“Otto Trucking’s Motion”), as well as the entirety of Exhibits 1-3 to the Lin Declaration.

11 3. The green highlighted portions of Otto Trucking’s Motion, as well as the entirety of
 12 Exhibits 1-2, contain or refer to trade secret information, which Waymo seeks to seal.

13 4. Otto Trucking’s Motion (green highlighted portions in version filed herewith) and
 14 Exhibits 1-2 (entire documents) contain, reference, and/or describe Waymo’s asserted trade secrets or
 15 information that, from context, tends to disclose Waymo’s asserted secrets, including as
 16 misappropriated by Defendants. The information Waymo seeks to seal includes the confidential
 17 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR
 18 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as
 19 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-
 20 31). The public disclosure of this information would give Waymo’s competitors access to
 21 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
 22 information were made public, I understand that Waymo’s competitive standing would be
 23 significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Otto Trucking’s
 25 Motion and Exhibits 1-2 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on October 6, 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28